

Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, the parties, Plaintiff Blackbird Vineyards, LLC and Defendants Turkovich Family Wines, LLC and Wine Bridge Imports, Inc., hereby stipulate to extend the time for Defendants to respond to Plaintiff's complaint and to continue the initial case management conference currently scheduled for August 7, 2018, and in support thereof, state as follows:

1. On May 9, 2018, Plaintiff filed Case No. 4:18-cv-02724-KAW against Defendants.

2. By order dated May 9, 2018 (ECF No. 5), the Court set an initial case management conference at 1:30 PM on August 7, 2018.

3. Plaintiff served its summons and complaint on Defendant Turkovich Family Wines, LLC on May 17, 2018 and on Defendant Wine Bridge Imports, Inc. on May 22, 2018.

4. Stipulations to enlarge the time to file responses to Plaintiff's complaint were filed on June 5 and 6, 2018 (ECF Nos. 13 and 14), extending the time for Defendants to file their responses to Plaintiff's complaint to July 9, 2018.

5. The parties have conferred and stipulate that, in order to allow Defendants to further evaluate Plaintiff's claims and to enable the parties to continue discussions regarding potential resolution of the above-referenced action, the time for Defendants to file their responses to Plaintiff's complaint should be extended by 30 days, specifically, from July 9, 2018 to August 8, 2018, and the initial case management conference should be continued from August 7, 2018 to September 4, 2018.

6. Other than the date of the initial case management conference, the parties' stipulation will not alter the date of any other event or deadline already fixed by Court order.

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties that Defendants will have until August 8, 2018 to respond to Plaintiff's complaint. The parties further respectfully request that the initial case management conference be continued to September 4, 2018.

SO STIPULATED.

DATED: July 9, 2018

Daniel A. Reidy

/s/ Daniel A. Reidy

Daniel A. Reidy

Attorney for

BLACKBIRD VINEYARDS, LLC

STIPULATION TO ENLARGE TIME TO FILE RESPONSE TO COMPLAINT AND TO
CONTINUE INITIAL CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER

1
2 DATED: July 9, 2018

Robert J. Ward

3
4 /s/ Robert J. Ward

5 Robert J. Ward
6 Attorney for
7 TURKOVICH FAMILY WINES, LLC

8
9 DATED: July 9, 2018

Lizbeth L. Hasse

10
11 /s/ Lizbeth Hasse

12 Lizbeth L. Hasse
13 Attorney for
14 WINE BRIDGE IMPORTS, INC.

15 **SIGNATURE ATTESTATION**

16 I am an ECF User whose identification and password are being used to file the foregoing
17 document. In compliance with Civil Local Rule 5-1, I hereby attest that the signatories indicated above
18 via a conformed signature have concurred in this filing.

19
20
21 DATED: July 9, 2018

Lizbeth Hasse

22
23 /s/ Lizbeth Hasse

24 Lizbeth Hasse
25 Attorney for
26 WINE BRIDGE IMPORTS, INC.

[PROPOSED] ORDER AS MODIFIED

PURSUANT TO STIPULATION, IT IS SO ORDERED. Defendants are to answer or otherwise respond to Plaintiff's complaint by August 8, 2018. The initial case management conference will be held on September 11, 2018 at 1:30 PM. The parties shall file a joint case management conference statement seven days prior to the conference.

DATED: July 10, 2018



PRESIDING JUDGE